IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA	INFORMATION
v.	Case No.
TYLER STEVEN HOFLAND	Violations: 18 U.S.C. §§ 1344 and 2

Aiding and Abetting Bank Fraud

The United States Attorney Charges:

1. <u>The Charge</u>. Between on or about June 12, 2019, and on or about December 19, 2019, in the District of North Dakota,

TYLER STEVEN HOFLAND,

knowingly aided and abetted Brady Torgerson in the crime of Bank Fraud, in violation of 18 U.S.C. § 1344, who defrauded First Security Bank — West (FSB-W) and obtained money from FSB-W by means of false or fraudulent pretenses, representations, and promises, with TYLER STEVEN HOFLAND having known that the of offense of Bank Fraud, was being committed or going to be committed by Brady Torgerson, and with TYLER STEVEN HOFLAND having had enough advance knowledge of the extent and character of this offense of Bank Fraud that he was able to make the relevant choice to walk away from the offense of Bank Fraud before all elements of the offense of Bank Fraud were complete;

Specifically, Tyler Hofland aided and abetted Brady Torgerson in executing a scheme to:

- (1) defraud FSB-W, a financial institution, whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), and
- (2) obtain any of the money, funds, assets, and other property owned by, and under the custody and control of FSB-W, a financial institution, whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), by means of false and fraudulent pretenses, representations, and promises;
- 2. The Scheme: Tyler Hofland sent communications to Brady Torgerson, President of FSB-W, requesting that Brady Torgerson send money belonging to FSB-W to other individuals to pay off a debt. Specifically, Tyler Hofland, who had a business relationship with Brady Torgerson, requested that Brady Torgerson pay Tyler Hofland's relatives an amount of \$98,163.40 utilizing FSB-W funds. On June 12, 2019, Tyler Hofland sent an email to Brady Torgerson with the subject line "House" stating that his mother-in-law and father-in-law would agree to purchase real property so long as Tyler Hofland was able to "Put 20% down on the property" and "[p]ay Brianne's aunt and uncle back for loaning [Tyler Hofland] money for the bad checks, which is hanging out at approximately \$96,758." On November 6, 20219, Tyler Hofland sent Brady Torgerson an email with the subject line "Loan Amount," informing Brady Torgerson that "the amount needed to satisfy the loan to Fran and Alan Rodenburg is \$98,163.40." On or about December 19, 2019, Brady Torgerson issued an FSB-W Money Order, number 4468346829, in the amount of \$98,163.40, with the remitter listed as Roy Hofland, Tyler Hofland's father, and payable to Alan Rodenburg, who was the individual who received this money order.

In violation of Title 18, United States Code, Sections 1344 and 2.

VICHOLAS W. CHASE

United States Attorney

JJO/tmg